Exhibit B

Deposition of:

Suzanne Parisian , M.D.

June 21, 2017

In the Matter of:

In Re: Bard IVC Filters Products Liability

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in regard to labeling; is that right?

A. Yes, sir.

Q. And if you look over at page 81, about midway through, there's a sentence that begins, "When Bard had the RNF...."

Do you see that?

A. Yes, sir.

Q. Okay.

A. "...cleared for the option..."?

Q. Yeah, that's right.

A. Uh-huh (affirmative).

Q. And -- and, specifically, it says, "When Bard had the RNF cleared for the 'option' to be used as a temporary I- -- IVC device, Bard continued to fail to adequately and voluntarily update its labeling, IFU, and warnings to include recommendations for indwell time range and warnings describing updated post-market risks."

Do you see that?

A. Yes, sir.

Q. And tell me what you meant there when you said "indwell time ranges."

A. The length of time you would leave the filter in place, which is the issue that's really kind of developed with the Morales article in 2013,

how long do you leave a temporary filter in place in a patient.

Q. And is it your opinion that there should have been something in the IFU for the recovery filter regarding a indwell time range?

A. Yes, based on the design of the device and what they were seeing in terms of the -- the fracture of metal, the perforation, the risks that they were seeing internally, the difference between the Simon Nitinol filter and the recovery filter, that a reasonable manufacturer would have tried to have provided some guidance as to removal. And that's -- that's what I'm talking about there.

So based on their internal documents, because we know FDA cleared it. FDA cleared it as a temporary option with no indwell time.

Q. And are you familiar with the clinical data that was in the IFU for the Recovery filter based on the Asch study?

A. Yes, sir.

Q. And did it contain ranges as far as when those particular Recovery filters were removed?

A. Yes, sir.

Q. And was that true for the IFUs for the G2 device when it reported on the clinical data for the